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7 (206) 623-7580

Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Seattle, Rm. 7206  
Hearing Date: February 3, 2017  
Hearing Time: 9:30 a.m.  
Response Date: January 27, 2017

7 UNITED STATES BANKRUPTCY COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 In re:  
11 NORTHWEST TERRITORIAL MINT, LLC,  
12 Debtor.

Case No. 16-11767-CMA

**REPLY IN SUPPORT OF MOTION TO  
APPROVE EMPLOYMENT OF CHIEF  
EXECUTIVE OFFICER**

13 Mark Calvert, the Chapter 11 Trustee (the “Trustee”) of Northwest Territorial Mint, LLC  
14 (“NWTM” or “Debtor”) submits this reply in support of his Motion to Approve the Employment of  
15 Bill M. Atalla as Chief Executive Officer (the “Motion”).

16 The Response of the Official Unsecured Creditors’ Committee (the “Committee”) to  
17 Trustee’s Motion to Approve Employment of Chief Executive Officer (Dkt. 888) supports the  
18 Trustee’s motion to employ a chief executive officer, reserving the right to comment on the specific  
19 terms of proposed employment and compensation. The Trustee has received comments from the  
20 Committee and has proposed modifications to the structure of certain compensation components of  
21 the proposed employment agreement with Mr. Atalla. The Trustee is working to finalize a written  
22 form of employment agreement which will include these modifications and remains in discussion  
23 with the Committee regarding those issues. The Trustee intends to file the proposed employment  
24 agreement in advance of the hearing on the Motion.

25 Creditor Jeffrey Mark McMeel (“McMeel”) filed a response to the Motion entitled “Stock  
26 Issue Order on Condition of Motion to Approve Employment of Chief Executive Officer”

REPLY IN SUPPORT OF MOTION TO APPROVE  
EMPLOYMENT OF CHIEF EXECUTIVE OFFICER - 1

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1 (Dkt. 867). The McMeel response provides no legal basis for imposing conditions on the Trustee's  
2 motion to employ a chief executive officer. To the extent that the McMeel response is construed as  
3 an objection to the Motion, it should be overruled.

4 Dated this 31st day of January, 2017.

5 K&L GATES LLP

6 By /s/ Michael J. Gearin

7 Michael J. Gearin, WSBA #20982

8 David C. Neu, WSBA #33143

9 Brian T. Peterson, WSBA #42088

10 Attorneys for Mark Calvert, Chapter 11 Trustee

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REPLY IN SUPPORT OF MOTION TO APPROVE  
EMPLOYMENT OF CHIEF EXECUTIVE OFFICER - 2

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1                   **CERTIFICATE OF SERVICE**  
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1                   The undersigned declares as follows:  
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That she is a Paralegal in the law firm of K&L Gates LLP, and on January 31, 2017, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Also on January 31, 2017, she caused the foregoing document to be mailed to the addresses listed below:

Northwest Territorial Mint LLC  
c/o Ross Hansen, Member  
P.O. Box 2148  
Auburn, WA 98071-2148

Jeffrey Mark McMeel  
900 Jefferson St. SE  
Olympia, WA 98501

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 31st day of January, 2017 at Seattle, Washington.

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15                   /s/ *Denise A. Evans*  
16                   Denise A. Evans  
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